

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE ESTATE OF YARON UNGAR by and through  
its Administrator, DAVID STRACHMAN; DVIR  
UNGAR, minor, by his guardians and next friends,  
YISHAI UNGAR, minor, by his guardians and next  
friends, PROFESSOR MEIR UNGAR, JUDITH  
UNGAR, individually and in their capacity as legal  
guardians of Plaintiffs DVIR UNGAR and YISHAI  
UNGAR; RABBI URI DASBERG, and JUDITH  
DASBERG, in their capacity as legal guardians of  
Plaintiffs DVIR UNGAR and YISHAI UNGAR;  
AMICHAH UNGAR; DAFNA UNGAR; and  
MICHAL COHEN,

Civil Action No. 07 CV 2572  
(CM) (LMS)

**NOTICE OF  
CROSS-MOTION**

Plaintiffs / Judgment-Creditors,

-against-

ORASCOM TELECOM HOLDING S.A.E.

Defendant / Garnishee.

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C O U N S E L :

PLEASE TAKE NOTICE that upon the annexed declarations of Robert J. Tolchin, Esq., dated August 15, 2007 (docket item 15), August 15, 2007 (docket item 16), and August 17, 2007 (docket item 21); the declaration of plaintiffs' capital markets expert George Gregor, dated August 15, 2007 (docket item 17); the declaration of Avraham Colthof, dated August 15, 2007 (docket item 18), the plaintiffs' memorandum of law, dated August 15, 2007 (docket item 22); the exhibits annexed thereto; and upon the pleadings and proceedings heretofore had herein, the plaintiffs will move this

Court, at the Courthouse located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order:

- a) PERMITTING the plaintiffs-judgment creditors to take discovery of defendant Orascom Telecom Holding, S.A.E. in respect to its jurisdictional contacts with New York, in the event that the Court finds that the plaintiffs-judgment creditors have not yet made a showing sufficient to defeat the motion of defendant Orascom Telecom Holding, S.A.E. to dismiss this action for lack of personal jurisdiction. (The relief requested is sought in the alternative, in the event that the Court does not accept plaintiffs-judgment creditors' primary position that they have made a showing sufficient to defeat the motion of the defendant Orascom Telecom Holding, S.A.E.); and
- b) GRANTING such other and further relief as is just and proper.

Dated: New York, New York  
August 22, 2007

Respectfully submitted,

JAROSLAWICZ & JAROS LLC  
*Attorneys for the plaintiffs*

by: S/Robert Tolchin  
Robert J. Tolchin

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TO: WHITE & CASE  
*Attorneys for the defendant*  
701 Thirteenth St, NW  
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